

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

**In re:**

**PURDUE PHARMA L.P., *et al.*,**

**Debtors.<sup>1</sup>**

**Chapter 11**

**Case No. 19-23649 (RDD)**

**(Jointly Administered)**

**THIRD SUPPLEMENTAL DECLARATION OF JEANNE C. FINEGAN**

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Pursuant to 28 U.S.C. § 1746, I, Jeanne C. Finegan, hereby declare as follows under penalty of perjury:

**I. Introduction**

1. I am a Managing Director and Head of Kroll Notice Media Solutions, an affiliate of Prime Clerk LLC (“**Prime Clerk**”),<sup>2</sup> the Court-appointed claims and noticing agent in these chapter 11 cases. Except as otherwise noted, this third supplemental declaration (“**Declaration**”) is based upon my personal knowledge of the matters set forth herein, my review of relevant documents, information provided to me by Purdue Pharma L.P. (“**PPLP**,” and together with its debtor affiliates, the “**Debtors**”) and their agents and professionals, including professionals at Davis Polk & Wardwell LLP and Prime Clerk, and my prior experience in bankruptcy and class action noticing. If called and sworn as a witness, I could and would testify competently thereto.

2. This Declaration provides the Court and parties in interest with a final report on the successful implementation of the Supplemental Notice Plan and the Extended Notice Plan (collectively, the “**Bar Date Notice Plan**”) discussed in Section III, and the Supplemental Confirmation Hearing Notice Plan discussed in Section IV.

**II. Notice Expertise and Qualifications**

3. My credentials, expertise, and experience that qualify me to provide an expert opinion and advice regarding notice in these chapter 11 cases include more than 30 years of communications and advertising experience, specifically in the bankruptcy and class action notice context, and are described further in my declaration filed on January 3, 2020 [Dkt. No.

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<sup>2</sup> Capitalized terms used herein and not otherwise defined shall have the meanings assigned to them in the *Supplemental Declaration of Jeanne C. Finegan* [Dkt. No. 1179] (the “**Supplemental Finegan Declaration**”) or the *Second Supplemental Declaration of Jeanne C. Finegan* [Dkt. No. 2917] (the “**Second Supplemental Finegan Declaration**”).

719] (the “**Finegan Declaration**”) in support of the *Debtors’ Motion for Entry of an Order (I)*

*Establishing Deadlines for Filing Proofs of Claim and Procedures Relating Thereto, (II)*

*Approving the Proof of Claim Forms, and (III) Approving the Form and Manner of Notice*

*Thereof*, dated January 3, 2020 [Dkt. No. 717], and which is incorporated herein by reference in its entirety.

### **III. The Bar Date Notice Plan and Results**

4. In accordance with the Bar Date Order, the Debtors commenced implementation of their noticing efforts on February 24, 2020, which was then contemplated to continue through June 30, 2020 (the “**General Bar Date**”). Pursuant to the *Order (I) Extending the General Bar date for a Limited Period and (II) Approving the Form and Manner of Notice Thereof*, dated June 3, 2020 [Dkt. No. 1221] (the “**Extended Bar Date Order**”), the General Bar Date was extended to July 30, 2020 (the “**Extended General Bar Date**”), and the Debtors were authorized to implement the Extended Notice Plan.

5. Upon final analysis, the Bar Date Notice Plan, which provided notice of the General Bar Date and Extended General Bar Date to both known and unknown claimants and parties in interest, ultimately reached an estimated 98% of all adults in the United States (“U.S.”)<sup>3</sup> 18 years and older with an average frequency of message exposure of eight times, and an estimated 86% of all adults in Canada 18 years and older with an average frequency of message exposure of four times.<sup>4</sup> Although news mentions of the General Bar Date and

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<sup>3</sup> Unless otherwise specified, U.S. includes the U.S. Territories of Guam, U.S. Virgin Islands, Northern Mariana Islands, American Samoa, and Puerto Rico.

<sup>4</sup> I estimated that, after making certain necessary adjustments resulting from the COVID-19 pandemic and other factors, the Bar Date Notice Plan would reach 95% of U.S. adults 18 years and older with an average frequency of six times, and 80% of Canadian adults 18 years and older with an average frequency of three times.

Extended General Bar Date cannot be calculated into the overall net reach, more than 2,500 news mentions across digital and broadcast media occurred, which no doubt further expanded the overall visibility of this historic effort.

6. Within three weeks of entry of the Bar Date Order, Prime Clerk distributed over 1.2 million mailings, including direct mail to known claimants and community outreach flyers (“**Bar Date Flyers**”) to third party organizations. The Bar Date package, which included the Bar Date Notice and the applicable proof of claim form(s), was mailed to all known claimants by February 18, 2020. In addition, on or before February 18, 2020, the two-page, full-color Bar Date Flyer was mailed to approximately 1.2 million individuals and entities including (i) all prescribers of Purdue brand name medications, (ii) U.S. pharmacies and institutions that received Purdue Opioids, and (iii) third-party organizations such as tribal leaders, veterans communities, treatment and addiction centers, mobile health teams, mining communities, religious leaders, homeless and women’s shelters, prison outreach organizations, and government agencies. JX-0932 is a true and correct copy of the Bar Date Flyer.

7. The Bar Date Notice Plan began in the U.S. on February 24, 2020, and in Canada on March 9, 2020, with a press release and earned media outreach. The press release informed potential claimants of the General Bar Date and how to file a claim against the Debtors in these cases, including how to request a claim form by mail, email, or phone, and directing them to the PurduePharmaClaims.com website (the “**Claims Website**”). Additional press releases were issued on May 1, 2020, and June 4, 2020. JX-0933 and JX-0938 are true and correct copies of the press releases. To date, the press releases and earned media outreach have generated over

2,500 news stories across the U.S. and Canada. The estimated publicity value<sup>5</sup> of the earned media for this outreach effort is \$ 1.4 million.

8. Google and Bing keyword search terms, online display, and social media advertisements also began in the U.S.<sup>6</sup> on February 24, 2020, and in Canada on March 9, 2020. JX-0934 is a true and correct sample of the keyword search, online display, and social media advertisements. YouTube digital video advertisements began in the U.S. on March 23, 2020, and in Canada on March 9, 2020. The Bar Date Notice Plan served over 382 million display media impressions in the U.S. and over 52 million display media impressions in Canada, which outpaced the planned impressions for the program. It also served over 1.1 billion social media impressions in the U.S. and over 71 million social media impressions in Canada, which far exceeded planned impressions. Collectively, the digital campaign, which included display, keyword search terms, social media advertisements, and digital video advertisements, served over 1.5 billion impressions in the U.S. and over 129 million impressions in Canada. The Claims Website went live on February 21, 2020. Between February 21, 2020 and July 31, 2021, when the Claims Website was removed, 652,800 users visited the website with over 1,460,000 page views or hits.

9. Print media in the U.S. began on February 27, 2020, with publication of the Court-approved Bar Date Notice in the *New York Times*, *Wall Street Journal*, and *USA Today*. JX-0935 is a true and correct copy of the Bar Date Notice. A summary of the Bar Date Notice was published in 79 local newspapers across West Virginia, Kentucky, Tennessee, Alabama,

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<sup>5</sup> Publicity value of media pick-up is an estimate of the cost of similar advertising had it been placed through paid media. The estimate contained herein is based on results from Cision Ltd., a leading global provider of earned media management software and insights to public relations and marketing communications professionals.

<sup>6</sup> In the U.S. Territories, digital media included only display advertisements and social media.

Arkansas, Mississippi, Oklahoma, Louisiana, Ohio, New Hampshire, and Pennsylvania.

Collectively, advertisements in newspapers served approximately four million impressions. A summary of the Bar Date Notice was published in the following consumer magazines: *People Magazine*, *People En Español*, *Sports Illustrated*, *Good Housekeeping*, *National Geographic*, *Parents*, *Men's Health*, and *Parents Latina*, which generated more than 120 million impressions.

A summary of the Bar Date Notice was also published in the following trade publications:

*Modern Healthcare*, *Journal of the American Medical Association*, *American Nurse Today*, *Journal of Pain and Symptoms Management*, *Pain Medicine News*, *Journal of Opioid Management*, *Social Work Today*, *Journal of Obstetric Gynecologic and Neonatal Nursing*, *Neonatal Network*, *Advances in Neonatal Care*, *Coal Age*, *Counselor*, and *VVA Veteran*. JX-0936 is a true and correct copy of the summary of the Bar Date Notice that was published in newspapers and magazines in the U.S. Print media in Canada began with publication of a summary of the Bar Date Notice in *Globe and Mail* and *Le Journal de Montreal* on March 23, 2020, and in *National Post* on March 24, 2020. A second insertion ran in these three newspapers on April 11, 2020. A summary of the Bar Date Notice was also published in *Canadian Geographic*, *Canadian Living*, *Maclean's*, *Coup de Pouce*, *Chatelaine* (English and French editions), *Reader's Digest* (English and French editions) and in *L'actualite*. Collectively, advertisements in magazines and newspapers served approximately 19 million impressions in Canada.

10. Thirty-second English and sixty-second Spanish<sup>7</sup> television ("TV") commercials aired on both network broadcast television and cable television in the U.S. between March 23,

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<sup>7</sup> Spanish television commercials, which aired only on Galavision, were sixty seconds in length due to translation and the additional number of words needed to convey the message.

2020 and May 10, 2020.<sup>8</sup> Over 45,000 TV commercials aired on ABC, NBC, and CBS, serving over 742 million impressions; over 182,000 TV commercials aired on CNN, Fox News, History, TNT, and Galavision, serving over 358 million impressions; and over 450 TV commercials aired on nine TV stations in the U.S. Territories. Commercials on Over the Top Television (“OTT”) such as Netflix, Hulu, and Amazon Prime also aired during the same time period, serving over 12 million impressions.

11. Sixty-second radio commercials aired in the U.S. on terrestrial and streaming radio between March 23, 2020 and May 10, 2020.<sup>9</sup> Over 177,000 radio commercials aired on Westwood One, Univision, and Native Voice One, serving approximately 232 million impressions, and approximately 775 radio commercials aired on 12 radio stations in the U.S. Territories. In addition, radio commercials on Pandora and Spotify<sup>10</sup> aired over the same time period, serving over 17 million streaming audio impressions.

12. Eighty-two billboards across West Virginia, Kentucky, Tennessee, and Alabama were posted on March 16, 2020, and were scheduled to run until April 12, 2020. However, as discussed in the Supplemental Finegan Declaration, 75 of the billboards continued to run beyond the originally scheduled four-week period.

13. At the time I submitted the Finegan Declaration, as set forth therein, it was my opinion that the Debtors’ Supplemental Notice Plan was broad, multifaceted, and adequately provided notice to all potential claimants. Indeed, at the time I submitted the Finegan Declaration, it was my further belief that the Debtors’ Supplemental Notice Plan was one of the

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<sup>8</sup> TV commercials in the U.S. Territories aired between April 6, 2020 and April 26, 2020.

<sup>9</sup> Radio commercial in the U.S. Territories aired between April 2, 2020 and April 26, 2020.

<sup>10</sup> Per the advertising guidelines, both Pandora and Spotify aired 30-second radio commercials.

largest legal notice programs ever developed. However, following the filing of the Finegan Declaration, certain adjustments and optimizations were made to the Supplemental Notice Plan, including but not limited to modifications implemented through the Extended Notice Plan in connection with the Extended General Bar Date, as described in the Supplemental Finegan Declaration.

14. Despite external factors, including COVID-19, as a result of Prime Clerk's adjustments and optimizations, which are described in detail in the Supplemental Finegan Declaration, the Bar Date Notice Plan exceeded our original projections in both the U.S. and Canada, reaching an estimated 98% of adults in the U.S. with an average frequency of message exposure of eight times and 86% of all adults in Canada with an average frequency of message exposure of four times. Because of Prime Clerk's adjustments and optimizations, as well as the increased media consumption during the COVID-19 pandemic, the Bar Date Notice Plan exceeded the planned reach and frequency.

#### **IV. The Supplemental Confirmation Hearing Notice Plan and Results**

15. Building on the awareness created by the Bar Date Notice Plan in connection with the General Bar Date and Extended General Bar Date, the Supplemental Confirmation Hearing Notice Plan reached an estimated 87% of all U.S. adults 18 years and older with an average frequency of message exposure of five times, and an estimated 82% of all Canadian adults 18 years and older with an average frequency of message exposure of six times.

16. Notice was further expanded to 39 countries not included in the Bar Date Notice Plan: Germany, England, Scotland, Wales, Northern Ireland, Italy, France, Spain, Switzerland, the Netherlands, Ireland, Belgium, China, South Korea, the Philippines, Malaysia, Hong Kong, Singapore, Brazil, Columbia, Mexico, South Africa, Australia, New Zealand, Denmark, Finland, Iceland, Norway, Sweden, Belarus, Ukraine, Czech Republic, Slovakia, Hungary, Romania,

Moldova, Bulgaria, Poland, and Russia. The Supplemental Confirmation Hearing Notice Plan was conducted in 27 different languages,<sup>11</sup> served over 3.6 billion online and social impressions, and resulted in over 3,400 news mentions around the world. The estimated publicity value of the earned media for this outreach effort is \$12.4 million.

17. The Supplemental Confirmation Hearing Notice Plan employed six primary methods of providing notice: (i) direct mailings to certain individuals and entities, (ii) print media (e.g., magazine and newspaper), (iii) online display (e.g., banner advertising on websites), (iv) internet search terms (e.g., Google); (v) social media campaigns (e.g., Facebook, Instagram, LinkedIn, YouTube, and Twitter), and (vi) earned media (e.g., press releases).<sup>12</sup> In the U.S., notice was provided in English and Spanish and served approximately 982 million impressions. In Canada, notice was provided in English and French and served approximately 172 million impressions. In the 39 other countries included in the Supplemental Confirmation Hearing Notice Plan, notice was provided in 27 different languages and served approximately 2.6 billion impressions.

18. As set forth in the Affidavit of Service [Dkt. No. 3319], the Debtors served via first-class mail the Confirmation Hearing Notice on all known holders of Claims and Interests, which I was advised by counsel to the Debtors includes all known holders of Shareholder Released Claims, all parties known to the Debtors as having potential claims against the Debtors'

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<sup>11</sup> These languages include: English, Spanish, French, German, Italian, Dutch, Russian, Ukrainian, Czech, Slovak, Hungarian, Romanian, Bulgarian, Polish, Danish, Finnish, Icelandic, Norwegian, Swedish, Flemish, Simplified Chinese, Korean, Tagalog, Malay, Traditional Chinese, Portuguese, and Afrikaans.

<sup>12</sup> In Canada, notice of the Confirmation Hearing was provided through print media; online display; internet search terms; Facebook, Instagram, and YouTube social media campaigns; and earned media. In the other 39 countries, notice of the Confirmation Hearing was provided through advertisements in local newspapers and Facebook, Instagram, YouTube, and WeChat social media campaigns.

estates as defined in paragraph 18(i) of the Bar Date Order (excluding those parties who have requested not to receive notice), and the Notice Parties (regardless of whether such parties are entitled to vote on the Plan) prior to the Solicitation Deadline. JX-0937 is a true and correct copy of the Confirmation Hearing Notice.

19. The Supplemental Confirmation Hearing Notice Plan began in the U.S. and Canada on June 16, 2021, with a press release and earned media outreach. The press release was titled, “Did you File a Claim Against Purdue Pharma as Part of its Bankruptcy Proceeding? Do You have a Claim Against Purdue Pharma’s Owners?” It provided information about the Confirmation Hearing, an overview of the Disclosure Statement Order, and deadlines for voting on the Plan, objecting to the Plan, and filing an allowance request. The press release also directed claimants to [www.PurduePharmaClaims.com](http://www.PurduePharmaClaims.com), the Claims Website that has, since June 16, 2021, been repurposed to focus on Confirmation Hearing information, and included a prominent section on the “Sackler Family Releases.” JX-0938 is a true and correct copy of the press release. The press release and earned media outreach generated over 3,700 news stories across the U.S. and Canada, affecting a potential audience of approximately 1,355,035,380. As of July 19, 2021, the Supplemental Confirmation Hearing Notice Plan efforts drove more than 292,200 users to the Claims Website, with over 344,100 page views.

20. Also on June 16, 2021, the publication version of the Confirmation Hearing Notice (the “**Publication Notice**”) was published in each of the following national or international newspapers: *The Wall Street Journal*, *The New York Times*, *USA Today*, *Financial Times (Worldwide edition)*, and *International Herald Tribune*. The Publication Notice provided an overview of the Disclosure Statement Order, the date for the Confirmation Hearing, and the

deadlines for voting on the Plan, objecting to the Plan, and filing an allowance request. JX-0939 is a true and correct copy of the Publication Notice.

21. A plain language summary of the Confirmation Hearing Notice was published in the weekday and Saturday editions of *The Globe & Mail*, *National Post*, and *Le Journal Montreal* in Canada on June 17, 2020 and June 26, 2021, as well as in 82<sup>13</sup> local newspapers across the 39 other countries included in the Supplemental Confirmation Hearing Notice Plan. Additionally, a plain language summary of the Confirmation Hearing Notice was published in each of the following magazines in the U.S.: *People Magazine* on July 2, 2021, *People En Espanol* on June 25, 2021, *Time Magazine* on June 25, 2021, and *Sports Illustrated* on July 13, 2021; and in each of the following magazines in Canada: *Chatelaine* (English edition) on July 1, 2021, *Maclean's* on July 15, 2021, and *Hello! Canada* on June 17, 2021. The plain language summary of the Confirmation Hearing Notice included the title “Did You File a Claim Against Purdue Pharma as Part of its Bankruptcy Proceeding? Do You Have a Claim Against Purdue Pharma’s Owners?” It included an overview of the Disclosure Statement Order, the date for the Confirmation Hearing, and the deadlines for voting on the Plan, objecting to the Plan, and filing an allowance request. JX-0940 is a true and correct copy of the summary of the Confirmation Hearing Notice that was published in newspapers and magazines in the U.S. Display

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<sup>13</sup> As is to be expected with a global noticing program of this scope, certain newspapers declined to run the plain language summary of the Confirmation Hearing Notice. While the program initially contemplated publication in 85 newspapers, seven newspapers declined to publish the notice. Of these, comparable substitutes were available for four newspapers. The *Suddeutsche Zeitung*, *The Joong Ang Ilbo*, *Manilla Bulletin*, and *The Star (Malaysia)* were substituted for the *Munchner Merker*, *Dong A Ilbo*, *Phillippine Daily Inquirer*, and *New Straights Times*, respectively. Three newspapers for which no comparable substitute was available declined the ad: *Sovietskaya Belarussia*, the *Moldavskiya Vedomosti*, and the *Shanghai Morning Post*. However, these three markets were covered by the extensive social media effort.

advertisements (described below) also ran on the following magazines' websites: *Good Housekeeping*, *Men's Health*, *Parents Latina*, *Parents*, *Women's Day*,<sup>14</sup> *Canadian Geographic*, *Canadian Living*, *Chatelaine* (French edition), *Reader's Digest* (English and French editions), *Coup de Pouce*, and *L'actualite*.<sup>15</sup> Advertisements in newspapers and magazines served approximately 76 million impressions in the U.S. and approximately 10 million impressions in Canada. Prime Clerk mailed a two-page, full-color flyer that included the same text as the magazine and newspaper advertisements described above (the "**Confirmation Hearing Flyer**") to approximately 1.2 million individuals and entities (including prescribers, pharmacies and institutions that received Purdue Opioids, and third-party organizations including the American Association for Justice) that received a summary of the Bar Date Notice, as described in paragraph 6 of the Supplemental Finegan Declaration. JX-0941 is a true and correct copy of the Confirmation Hearing Flyer.

22. The digital portion of the Supplemental Confirmation Hearing Notice Plan (online display, internet search terms, and social media) served online advertisements to individuals with creative messages designed for various demographics and directed them to the Claims Website for additional information—including information about the Confirmation Hearing. All of the online display, internet search term, and social media advertisements provided the Confirmation Hearing date and voting deadlines, included the language "Did you file a claim against Purdue

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<sup>14</sup> The Second Supplemental Finegan Declaration stated that the Supplemental Confirmation Hearing Notice Plan would include the print editions of *Women's Day* and *Parents* as well as an additional insertion in *Sports Illustrated*. However, print advertisements could not be included due to publisher deadlines. The Second Supplemental Declaration also included the *National Geographic* website. However, *National Geographic* no longer accepts legal notice advertising.

<sup>15</sup> The Second Supplemental Finegan Declaration stated that the Supplemental Confirmation Hearing Notice Plan would include the print editions of *Reader's Digest* (English and French editions), *Coup de Pouce*, and *L'actualite*. However, print advertisements could not be included due to publisher deadlines.

Pharma? Think you have a claim against the Sacklers or any of Purdue Pharma's owners?" and directed individuals to the Claims Website for additional information on the Plan and Confirmation Hearing. JX-0942 is a true and correct sample of the online display, internet search term, and social media advertisements. The Supplemental Confirmation Hearing Notice Plan targeted fans or followers of specialized social media pages and groups that relate to opioid abuse such as addiction centers, recovery groups, specialized doctors, and national organizations, as well as individuals who use certain search terms on Google. It served over 906 million digital media impressions in the United States, over 162 million digital media impressions in Canada, and over 2.6 billion digital media impressions in the other 39 countries included in the Supplemental Confirmation Hearing Notice Plan.

23. Prime Clerk's media team modified the Supplemental Confirmation Hearing Notice Plan as needed to ensure optimal reach and frequency. Our media team regularly performed quality control reviews of the Supplemental Confirmation Hearing Notice Plan's implementation to ensure resources were maximized and deployed efficiently and effectively. We also actively managed and optimized the various media channels, refining the Supplemental Confirmation Hearing Notice Plan and shifting budget toward the media channels and targeting that delivered the greatest results. Optimizations were determined based on data from attribution sources on Google Analytics. As a result, like the Bar Date Notice Plan, the Supplemental Confirmation Hearing Notice Plan exceeded our original projections in the U.S. and Canada in both reach and frequency, and exceeded the number of planned social media impressions in the other 39 countries included in the Supplemental Confirmation Hearing Notice Plan. The Supplemental Confirmation Hearing Notice Plan reached an estimated 87% of adults in the U.S. with an average frequency of message exposure of five times and 82% of all adults in Canada

with an average frequency of message exposure of six times, and served over 2.6 billion social impressions in the 39 other countries.

**V. Conclusion**

24. In total, as of July 19, 2021, the combined outreach efforts in respect of the Bar Date Notice Plan and the Supplemental Confirmation Hearing Notice Plan have resulted in over 5.2 billion impressions being served across digital media, over 7,100 news mentions globally, and more than 890,000 users visiting the Claims Website, generating more than 1.7 million page views.

25. In my opinion, the robust and comprehensive outreach efforts employed for the Debtors' notice procedures, including the Bar Date Notice Plan and the Supplemental Confirmation Hearing Notice Plan, have been historic in the context of bankruptcy notice. Notice efforts employed were particularly appropriate, highly targeted, efficient, and afforded a modern way to provide notice to known and unknown claimants. The Debtors' notice procedures were broad and multifaceted and were designed to reach the target population in a variety of different ways. Ultimately, when combined with the other methods of notice—including unmeasured methods such as community outreach—I believe that the overall effort likely achieved even greater results than described above.

26. For all of the reasons discussed in this Declaration, it is my opinion that the Debtors' Bar Date Notice Plan and the Supplemental Confirmation Hearing Notice Plan effectively and efficiently reached the targeted population.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: August 5, 2021

*/s/ Jeanne C. Finegan*  
Jeanne C. Finegan